REMARKS

Applicant has carefully reviewed and considered the Final Office Action mailed on July 2, 2007, and the references cited therewith.

Claims 1, 14, 22, 26, 30, and 34 are amended, no claims are canceled, and no claims are added; as a result, claims 1-38 are now pending in this application.

Specification Objections

The Disclosure was objected to because of the following informalities:

Page 3 line 2: "printing device 740" should be – printing device 100 – . Applicant thanks the Examiner for reporting this clerical oversight and respectfully suggests that the appropriate correction has been made according to the following amendment:

> The printing device 100 illustrated in the embodiment of Figure 1A can operate as a stand alone device and/or can be used as a printing device in a system, such as the printing device [[740]] 710 shown in the system environment 700 of Figure 7.

The amendment noted above reflects language recited with respect to Figure 7 on page 13 lines 9-10: "Figure 7 illustrates an embodiment of a printing device 710 networked in a system environment 700." Applicant respectfully submits that the appropriate correction has been made.

§ 102 Rejection of the Claims

Claims 1, 3, 9-11, 22, and 26 were rejected under 35 USC § 102(e) as being anticipated by So et al. (U.S. Patent No. 6,832,004). Applicant respectfully traverses the rejection as follows.

From Applicant's review, the So reference appears to describe:

> The prediction errors thus obtained are compared with a tolerance designated by the tolerance designation circuit **14**. As a result of the comparison, the predictor determination circuit **13** selects <u>one</u> of the predictors for addressing the pixel of interest.

(Col. 7 lines 12-16). The So reference does not describe tracking a pool of pixel predictors, each pixel predictor having a value, and selecting a subset of pixel predictors from the pool, the subset including a number of predictors that is associated with a number of bits used to represent a pixel.

In contrast, Applicant's independent claim 1, as amended, recites "selecting a subset of pixel predictors from the pool, the subset including a number of predictors that is associated with a number of bits used to represent a pixel."

Applicant's independent claim 22, as amended, recites "selecting a number of pixel predictors having the highest hit counters for future pixel predictions, the number including a number of predictors that is associated with a number of bits used to represent a pixel".

Applicant's independent claim 26, as amended, recites "selecting a number of pixel predictors having the highest hit counters for future pixel predictions, the number including a number of predictors that is associated with a number of bits used to represent a pixel".

As such, Applicant respectfully submits that each and every element and limitation of independent claims 1, 22, and 26 as amended, is not present in the So reference. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 102 rejection of independent claims 1, 22, and 26, as amended, as well as dependent claims 3 and 9-11 that depend from allowable claim 1.

§ 103 Rejection of the Claims

Claims 2, 4-6, 25 and 29 were rejected under 35 USC § 103(a) as being unpatentable over So et al. (U.S. Patent No. 6,832,004) in view of Clouthier et al. (U.S. Publication No. 2003/0184809). Applicant respectfully traverses the rejection as follows.

Claims 2 and 4-6 depend from independent claim 1. For the reasons provided above with respect to the 102 rejections, Applicant respectfully submits that independent claim 1 is allowable in view of the So reference. From the Applicant's

review, the Clouthier reference does not cure the deficiencies of the So reference with respect to claim 1. That is, the Clouthier reference does not describe, teach or suggest "selecting a subset of pixel predictors from the pool, the subset including a number of predictors that is associated with a number of bits used to represent a pixel."

Claim 25 depends from independent claim 22. For the reasons provided above with respect to the 102 rejections, Applicant respectfully submits that independent claim 22 is allowable in view of the So reference. From the Applicant's review, the Clouthier reference does not cure the deficiencies of the So reference with respect to claim 22. That is, the Clouthier reference does not describe, teach or suggest "selecting a number of pixel predictors having the highest hit counters for future pixel predictions, the number including a number of predictors that is associated with a number of bits used to represent a pixel".

Claim 29 depends from independent claim 26. For the reasons provided above with respect to the 102 rejections, Applicant respectfully submits that independent claim 22 is allowable in view of the So reference. From the Applicant's review, the Clouthier reference does not cure the deficiencies of the So reference with respect to claim 22. That is, the Clouthier reference does not describe, teach or suggest "selecting a number of pixel predictors having the highest hit counters for future pixel predictions, the number including a number of predictors that is associated with a number of bits used to represent a pixel".

As such, the references do not, either independently or in combination, describe, teach or suggest each and every element and limitation of independent claims 1, 22, and 26 as amended. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 103 rejection of dependent claims 2 and 4-6, which depend from allowable claim 1, dependent claim 25, which depends from allowable claim 22, and dependent claim 29, which depends from allowable claim 26.

Claims 7, 8, 12 and 13 were rejected under 35 USC § 103(a) as being unpatentable over So et al. (U.S. Patent No. 6,832,004) in view of Weinberger et al.

("The LOCO-I Lossless Image Compression Algorithm: Principles and Standardization into JPEG-LS", IEEE Transactions on Image Processing, Vol. 9, No. 8, Aug 2000, pp. 1309-1324). Applicant respectfully traverses the rejection as follows.

Claims 7, 8, 12, and 13 depend from independent claim 1. For the reasons provided above with respect to the 102 rejections, Applicant respectfully submits that independent claim 1 is allowable in view of the So reference. From the Applicant's review, the Weinberger reference does not cure the deficiencies of the So reference with respect to claim 1. That is, the Weinberger reference does not describe, teach or suggest "selecting a subset of pixel predictors from the pool, the subset including a number of predictors that is associated with a number of bits used to represent a pixel".

Claims 14, 15, 18, 21, 23, 24, 27 and 28 were rejected under 35 USC § 103(a) as being unpatentable over So et al. (U.S. Patent No. 6,832,004) in view of Hoel (U.S. Patent No. 6,741,368). Applicant respectfully traverses the rejection as follows.

Independent claim 14, as amended, presently recites "selecting a number of pixel predictors having the highest hit counters for future pixel predictions, the number including a number of predictors that is associated with a number of bits used to represent a pixel." As described above, the So reference appears to describe that the predictor determination circuit 13 selects one of the predictors for addressing the pixel of interest. (Column 7 lines 14-16). The So reference does not appear to describe, teach, or suggest selecting a number of pixel predictors having the highest hit counters for future pixel predictions, the number including a number of predictors that is associated with a number of bits used to represent a pixel. Indeed, the So reference does not contemplate selecting more than one predictor for future pixel predictions. As such, the So reference does not describe, teach, or suggest each and every element and limitation found in Applicant's independent claim 14, as amended.

From the Applicant's review, the Hoel reference does not cure the deficiencies of the So reference. That is, the Hoel reference, neither alone nor in combination with the So reference, describes, teaches, or suggests "selecting a number of pixel predictors

having the highest hit counters for future pixel predictions, the number including a number of predictors that is associated with a number of bits used to represent a pixel."

Therefore, the references do not, either independently or in combination, describe, teach or suggest each and every element limitation of independent claim 14, as amended. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 103 rejection of independent claim 14, as well as for those claims which depend therefrom.

Claims 15, 18, and 21 depend from independent claim 14. For the reasons provided above, Applicant respectfully submits that independent claim 14 is allowable in view of the So and Hoel references.

Claims 23 and 24 depend from independent claim 22. For the reasons provided above with respect to the 102 rejections, Applicant respectfully submits that independent claim 22 is allowable in view of the So reference. From the Applicant's review, the Hoel reference does not cure the deficiencies of the So reference with respect to claim 22. That is, the Hoel reference does not describe, teach or suggest "selecting a number of pixel predictors having the highest hit counters for future pixel predictions, the number including a number of predictors that is associated with a number of bits used to represent a pixel".

Claims 27 and 28 depend from independent claim 26. For the reasons provided above with respect to the 102 rejections, Applicant respectfully submits that independent claim 22 is allowable in view of the So reference. From the Applicant's review, the Clouthier reference does not cure the deficiencies of the So reference with respect to claim 26. That is, the Clouthier reference does not describe, teach or suggest "selecting a number of pixel predictors having the highest hit counters for future pixel predictions, the number including a number of predictors that is associated with a number of bits used to represent a pixel".

As such, the references do not, either independently or in combination, describe, teach or suggest each and every element and limitation of independent claims 14, 22, and 26 as amended. Accordingly, Applicant respectfully requests reconsideration and

withdrawal of the 103 rejection of independent claim 14 and dependent claims 15, 18, and 21, which depend from allowable claim 14, dependent claims 23 and 24, which depend from allowable claim 22, and dependent claims 27 and 28, which depend from allowable claim 26.

Claims 16, 17 and 31 were rejected under 35 USC § 103(a) as being unpatentable over So et al. in view of Hoel as applied to claim 15 above, and further in view of Clouthier et al. Applicant respectfully traverses the rejection as follows.

Claims 16 and 17 depend from independent claim 14. For the reasons provided above, Applicant respectfully submits that independent claim 14 is allowable in view of the So and Hoel references. From the Applicant's review, the Clouthier reference does not cure the deficiencies of the So and Hoel references with respect to claim 14. That is, the Clouthier reference does not describe, teach or suggest "selecting a number of pixel predictors having the highest hit counters for future pixel predictions, the number including a number of predictors that is associated with a number of bits used to represent a pixel."

Claim 31 depends from independent claim 30. For the reasons provided below, Applicant respectfully submits that independent claim 30 is allowable in view of the Hoel and So references. From the Applicant's review, the Clouthier reference does not cure the deficiencies of the Hoel and So references with respect to claim 30. That is, the Clouthier reference does not describe, teach or suggest logic on the device to "select a subset of pixel predictors from the pool, the subset including a number of predictors that is associated with a number of bits used to represent a pixel".

As such, the references do not, either independently or in combination, describe, teach or suggest each and every element and limitation of independent claims 14 and 30 as amended. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 103 rejection of dependent claims 16 and 17, which depend from allowable claim 14, and dependent claim 31, which depends from allowable claim 30.

Claims 19 and 20 were rejected under 35 USC § 103(a) as being unpatentable over So et al. in view of Hoel as applied to claim 15 above, and further in view of Weinberger et al. Applicant respectfully traverses the rejection as follows.

Claims 19 and 20 depend from independent claim 14. For the reasons provided above, Applicant respectfully submits that independent claim 14 is allowable in view of the So and Hoel references. From the Applicant's review, the Weinberger reference does not cure the deficiencies of the So and Hoel references with respect to claim 14. That is, the Weinberger reference does not describe, teach or suggest "selecting a number of pixel predictors having the highest hit counters for future pixel predictions, the number including a number of predictors that is associated with a number of bits used to represent a pixel."

As such, the references do not, either independently or in combination, describe, teach or suggest each and every element and limitation of independent claim 14 as amended. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 103 rejection of dependent claims 19 and 20, which depend from allowable claim 14.

Claims 30 and 32-35 were rejected under 35 USC § 103(a) as being unpatentable over Hoel in view of So et al. Applicant respectfully traverses the rejection as follows.

Independent claim 30, as amended, presently recites:

[A] set of computer executable instructions stored on the memory and executed by the processor to:
track a pool of pixel predictors, each pixel predictor having a value,
select a subset of pixel predictors from the pool, the subset including a number of predictors that is associated with a number of bits used to represent a pixel,
update the value of only those pixel predictors of the subset with each pixel processed, and
rebalance the pixel predictor subset to locally adapt to image conditions.

Page 13 of the Office Action mailed July 2, 2007 states:

Hoel does not explicitly disclose a set of computer executable instructions/logic on the device stored on the memory and executed by

the processor to: track a pool of pixel predictors, each pixel predictor having a value, select a subset of pixel predictors from the pool, update the value of only those pixel predictors of the subset with each pixel processed, and rebalance the pixel predictor subset to locally adapt to image conditions.

From the Applicant's review, the So reference does not cure the deficiencies of the Hoel reference. That is, the So reference, neither independently nor in combination with the Hoel reference, describes, teaches, or suggests a set of computer executable instructions stored on the memory and executed by the processor to "select a subset of pixel predictors from the pool, the subset including a number of predictors that is associated with a number of bits used to represent a pixel".

Therefore, the references do not, either independently or in combination, describe, teach or suggest each and every element limitation of independent claim 30, as amended. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 103 rejection of independent claim 30, as well as for those claims which depend therefrom.

Claims 32 and 33 depend from independent claim 30. For the reasons provided above, Applicant respectfully submits that independent claim 30 is allowable in view of the Hoel and So references.

Independent claim 34, as amended, presently recites:

logic on the device to:
track a pool of pixel predictors, each pixel predictor having a value,
select a subset of pixel predictors from the pool, the subset including a number of predictors that is associated with a number of bits used to represent a pixel,
update the value of only those pixel predictors of the subset with each pixel processed, and
rebalance the pixel predictor subset to locally adapt to image conditions.

As quoted above, Examiner notes that the Hoel reference does not disclose each and every element limitation of Applicant's independent claim 34.

From the Applicant's review, the So reference does not cure the deficiencies of the Hoel reference. That is, the So reference, neither independently, nor in combination

with the Hoel reference, describes, teaches, or suggests logic on the device to "select a subset of pixel predictors from the pool, the subset including a number of predictors that is associated with a number of bits used to represent a pixel".

Therefore, the references do not, either independently or in combination, describe, teach or suggest each and every element limitation of independent claim 34, as amended. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 103 rejection of independent claim 14, as well as for those claims which depend therefrom.

Claim 35 depends from independent claim 34. For the reasons provided above, Applicant respectfully submits that independent claim 34 is allowable in view of the Hoel and So references.

As such, the references do not, either independently or in combination, describe, teach or suggest each and every element and limitation of independent claims 30 and 34 as amended. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 103 rejection of independent claims 30 and 34, as well as dependent claims 32 and 33, which depend from allowable claim 30, and dependent claim 35, which depends from independent claim 34.

Claims 36-38 were rejected under 35 USC § 103(a) as being unpatentable over Hoel in view of So et al. as applied to claim 35 above, and further in view of Weinberger et al. Applicant respectfully traverses the rejection as follows.

Claims 36-38 depend from independent claim 34. For the reasons provided above, Applicant respectfully submits that independent claim 34 is allowable in view of the Hoel and So references. From the Applicant's review, the Weinberger reference does not cure the deficiencies of the So and Hoel references with respect to claim 14. That is, the Weinberger reference does not describe, teach or suggest logic on the device to "select a subset of pixel predictors from the pool, the subset including a number of predictors that is associated with a number of bits used to represent a pixel".

As such, the references do not, either independently or in combination, describe, teach or suggest each and every element and limitation of independent claim 34 as amended. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 103 rejection of dependent claims 36-38, which depend from allowable claim 34.

Conclusion

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney Guillaume Durville at 011-04-93-582-2232.

At any time during the pendency of this application, please charge any additional fees or credit overpayment to the Deposit Account No. 08-2025.

CERTIFICATE UNDER 37 CFR §1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: **MS AF** Commissioner for Patents, P.O. BOX 1450 Alexandria, VA 22313-1450, on this 30ᵗ day of August , 2007.

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